

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Newport News Division**

JACQUELINE BOONE, *et al.*,

Plaintiffs,

v.

ENCORE CAPITAL GROUP, INC., et al.,

Defendants.

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Civil Action No. 4:11cv164

**PLAINTIFFS' MOTION TO TRANSFER VENUE AND TO CONSOLIDATE**

Plaintiffs, by counsel, file this motion to transfer venue to the Richmond Division of the Eastern District of Virginia and to consolidate this case with *Adkins, et al. v. Encore Capital Group, Inc., et al.*, Civil No. 3:11-cv-334, for the reasons delineated in their memorandum filed contemporaneously herewith.

Respectfully submitted,  
PLAINTIFFS BOONE, et al.,

/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 19th day of January, 2012 I have electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification to the following:

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